

# **Bath & North East Somerset Core Strategy**

## **Sustainability Appraisal (incorporating Strategic Environmental Assessment)**

Adoption Statement

July 2014

# 1 Introduction

This SA Adoption Statement forms the final output from the Sustainability Appraisal (SA) of the Bath & North East Somerset Core Strategy. The Core Strategy is a key policy document for Bath & North East Somerset (B&NES) that puts in place a strategic planning framework to guide change and development in the District over the next 20 years. It sets out a Spatial Vision for the District and seven Strategic Objectives which expand this Vision into specific issues for the area which need to be addressed. Sustainable Development is the core principle underpinning the Core Strategy, expressed through the Spatial Vision and Strategic Objectives.

The SA process has integrated the requirements of Strategic Environmental Assessment (SEA) (hereafter this integrated process is referred to as SA), in line with the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004,<sup>1</sup> (the SEA Regulations). According to Regulation 16(3) of the SEA Regulations the Adoption Statement must include:

How sustainability, and in particular environmental, considerations have been integrated into the Plan;

How the Sustainability Appraisal has been taken into account;

How the opinions expressed in response to the relevant consultations on the SA report(s) have been taken into account;

The reasons for choosing the plan as adopted in light of other reasonable alternatives; and

The measures agreed to monitor all the significant environmental effects of the implementation of the plan.

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<sup>1</sup> Statutory Instrument 2004/1633.

## **2. How sustainability and environmental considerations and the Sustainability Appraisal Report have been integrated into the Core Strategy**

### **2.1 Stage A Scoping**

An SA Scoping Report for the Core Strategy was produced in June 2007 to help ensure that the SA process identified and addressed the key sustainability issues for spatial planning in Bath & North East Somerset. From all of the information collected, an “SA Framework”, or set of sustainability objectives, was developed, against which the various components of the Core Strategy have been appraised.

The data presented within the Scoping Report has been updated in response to the consultation responses received on the Scoping Report. Some of the information presented within the Scoping Report was updated in February 2010 because a considerable amount of time had passed since the Scoping Report was prepared in 2007. The updated data has informed the appraisal of the Core Strategy. The updated Scoping Report information can be found in Section 4. The Framework was again updated taking into account the publication of the National Planning Policy Framework in December 2012 and new baseline information was also collated in 2013. The updated data has informed the appraisal of the Core Strategy.

### **2.2 Stage B Assessing Options**

Preparation of the Core Strategy involved production of a Core Strategy Launch Document to stimulate discussion of issues (BANES, September 2007), the production of “options” in the Core Strategy Spatial Options Consultation document (BANES, October 2009) and the publication of a Draft Core Strategy (BANES, December 2010). The process of plan preparation has been one of not only “narrowing down” from a range of options, but also of then “working up” policy wording in more detail. SA has been part of this iterative process.

#### **a. Core Strategy Options Document Oct 2009**

The Core Strategy Spatial Options Consultation document (October 2009) set out discreet options which were subject to sustainability appraisal in August 2009. These included: district wide spatial options and spatial options for Bath, a new neighbourhood in an urban extension to Bath, Keynsham, New Neighbourhood at South East Bristol, Midsomer Norton and Radstock, and options for Rural areas. The consultation document also outlined core policies.

Detailed policy wording was not included in the Spatial Options document. At this stage the issues dealt with by the policies along with a suggested policy direction were indicated. The conclusions of the SA at the Options stage, along with the consultation responses and additional evidence, were used to inform the preparation of policy wording included in the Publication Core Strategy.

The full results of the Spatial Options appraisals are presented within the Core Strategy Spatial Options Interim Sustainability Appraisal Report Appendix A (September 2009, Revised December 2009 CD4/A6).

In keeping with the guidance, the effects of the strategic options were assessed in three stages:

- Mid 2008 informal comments were provided by ENVIRON on the emerging options (the assessment focused on the appropriateness of the vision and objectives for the plan as a whole and each sub area). These comments were presented and discussed at a meeting with Bath and North East Somerset Council planning policy team and used to inform the development of the consultation version of the Spatial Options Paper;
- Late 2008 further comments were provided by ENVIRON on the emerging options and were again presented and discussed at a meeting with Bath and North East Somerset Council planning policy team. These recommendations were used internally by Bath and North East Somerset Council to help formulate spatial options and core policies; and
- In August 2009 the consultation document 'Core Strategy Options Paper' was assessed. The results of this assessment were consulted on alongside this Options Paper. This assessment was informed by the Habitats Regulation. The interim report can be access from the below.

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/SpatialOptions/CSSO-SustainabilityAppraisal.pdf>

**b. Core Strategy Publication Document December 2010**

The appraisal of the Publication Core Strategy DPD was undertaken by independent consultants from ENVIRON during August and October 2010. Before the formal appraisals of the Publication Document in October, informal appraisals were undertaken in August. This was to ensure that sustainability considerations were fully integrated into the policy formation. The early draft document containing emerging policies were sent to ENVIRON and the result of the assessment was presented to the Council which helped to refine the Vision and Objective as well as spatial policies and core policies.

The final results of the appraisals are presented in the SA report below and published along with the Publication Core Strategy. Section 6 of the SA report presents the significant effects of the vision, plan objectives, draft policies and strategies of the Publication Core Strategy. Mitigation measures and recommendations were put forward in the appraisal matrices and these have been considered by the policy authors. This helped to improve policies and set appropriate considerations for the subsequent Placemaking Plan where necessary.

The matrices in Annex D record the responses to the mitigation measures and recommendations made in the appraisals, and the residual effects of the policies and strategies after the changes have been made in response to the mitigation measures and recommendations are recorded in the SA report.

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/DCSAAppraisal-SA.pdf>

**c. Core Strategy Submission Document (May 2011)**

Following the public consultation, the Council made minor changes to the Publication Core Strategy. The SA report and Annexes were updated accordingly and submitted to the Secretary of State in May alongside the Submission Core Strategy.

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/Submission/SubmittedDCSSAReport.pdf>

**d. Core Strategy Proposed changes to the submission Document September 2011**

In response to issues raised by the Inspector changes to the submission version of the Core Strategy were made in September 2011 and housing contingency locations were also considered. ENVIRON undertook an assessment of the changes and this is documented in the SA Report. The potential impact on sustainability of including greenfield housing contingency locations in the plan was also assessed. Annex K below set out the assessment of Housing Contingency Sites. The Council used these assessments, along with other evidence, in deciding not to identify greenfield housing contingency as part of the Proposed Changes to the submission Core Strategy.

Annex K

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/DCSPC-SustainabilityAppraisalAnnexK.pdf>

A screening assessment (Annex J) was undertaken for the Proposed Changes to determine which amendments warranted re-assessment. The re-assessment concluded that no further major significant effects were identified regards to the submission draft changes. The report has subsequently been updated to take into account changes to the submission version of the Core Strategy suggested by the Planning Inspector and the Council as below.

SA Report

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/DCSPC-SustainabilityAppraisalReport.pdf>

SA Report Annex J

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/DCSPC-SustainabilityAppraisalAnnexJ.pdf>

**e. Core Strategy further changes to the submission Document March 2013**

The Core Strategy Examination was suspended to enable the Council to undertake further work to address the Inspector's preliminary conclusions in June 2012. The further work led to significant changes particularly the inclusion of urban extension locations to respond to updated and revised housing requirements.

In order to find the most sustainable locations to meet the needs of the District, the Council applied a sequential staged SA assessment. A strategic approach was taken, appropriate to the Core Strategy level of plan-making and to minimize pre-empting the preparation of the Placemaking DPD that, at that time, was to consider the sites in more detail. The approach to alternatives (or options) appraisal involved a hierarchical approach.

- Stage 1 District-wide locational sequence assessment
- Stage 2 Identification of suitable locations based on cells around existing settlements
- Stage 3 Site assessments
- Stage 4 Growth level assessments

Annex L below sets out the detailed assessment to identify the broad locations for urban extensions. These assessments helped the Council to identify the most sustainable locations to accommodate the required housing for the District. It helped to avoid the areas without adequate mitigation measures. Mitigations measures recommended by the site assessment at stage 3 informed setting out the Placemaking Principles under each broad area allocation policy.

SA Report

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc\\_sa\\_report.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_report.pdf)

Annex L

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc\\_sa\\_annex\\_l.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_l.pdf)

**f. Core Strategy further changes to the submission Document November 2013**

In November 2013 an addendum report to the SA Report to the Proposed Changes to the Submitted Core Strategy which were published in March 2013 was produced by Bath and North East Somerset Council Planning Policy team. The March Changes indicated the broad locations for urban extensions leaving the Placemaking Plan to define the most suitable sites for development. However the Inspector (ID40) raised his concerns regarding clarity and the deliverability of housing development sites within the 5 year period. Responding to the Inspector's concern, the Council has identified specific sites for allocation within the broad areas indicated previously.

In order to identify the most suitable sites within the broad locations previously identified further new evidence was prepared such as Transport Studies, WHS setting and AONB Landscape and Visual Impact Assessment and Viability Study. This new evidence was used to identify the areas that offer reasonable prospects of accommodating the required uses and capacities sustainably using the same SA framework.

Annex O sets out the appraisal of individual development parcels within the potential Green Belt allocations. These appraisals informed the boundaries of the allocated sites and the wording of the site allocation policies within the Core Strategy, in particular, the Placemaking Principles which set out mitigation required through masterplanning in order to deliver the sites.

The assessments were presented in Annex O below.

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/cssa\\_sa\\_annex\\_o\\_site\\_appraisals\\_nov\\_2013.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/cssa_sa_annex_o_site_appraisals_nov_2013.pdf)

The screening of the Amendments to Proposed Changes to the draft Core Strategy

was undertaken. Amendments which were considered to make a difference to the Sustainability Appraisal of the Core Strategy and are therefore considered to be significant were reassessed and Annex D was updated accordingly.

The SA report can be access from below.

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/cssa\\_sa\\_report\\_nov\\_2013.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/cssa_sa_report_nov_2013.pdf)

**g. Sustainability Appraisal of the Adopted Core Strategy (July 2014)**

Following the hearings, the final Inspector's Report together with the schedule of Inspector's Recommended Main Modifications was received by the Council. Main modifications received from the Inspector plus Additional modifications proposed by the Council in July were subject to screening.

Annex M Volume 1 presents the findings of the screening of the changes to the Submitted Core Strategy. The screening process has identified changes which are considered to make a difference to the Sustainability Appraisal (SA) of the Core Strategy (i.e. that the previous assessment of the Submitted Core Strategy requires amendment or a new policy has been introduced which requires assessment) and are therefore considered to be significant.

Where significant changes have been identified, Annex D of the final SA report has been updated to either amend the previous policy assessment matrix or to insert a new policy assessment matrix. The main SA Report has also been updated accordingly.

### **3. Consultation on the SA**

The SEA Regulations require evidence to be provided regarding consultation with the statutory consultation bodies and the public and to demonstrate how these opinions have been taken into account in the development of the plan.

#### **3.1 Scoping Report December 2007**

An SA Scoping Report of the Core Strategy DPD was produced in June 2007 to help ensure that the SA process covered the key sustainability issues for spatial planning in Bath & North East Somerset. The Scoping Report presents the outputs of all of the tasks in Stage A (the scoping phase of the SA) and includes baseline information, review of relevant plans and identification of significant sustainability issues for the Core Strategy DPD.

The scoping report was sent to statutory consultees and was made available for 6 weeks consultation from the 28th June until 2nd August 2007.

The data and the draft SA Framework presented within the Scoping Report has been updated in response to the consultation responses received on the Scoping Report. Some of the information presented within the Scoping Report was updated in February 2010 because a considerable amount of time had passed since the Scoping Report was prepared in 2007. The Framework was updated taking into account the publication of the National Planning Policy Framework in December 2012 and new baseline information was also collated in 2013. The updated data has informed the appraisal of the Core Strategy.

#### **3.2 Options Stage Oct 2009**

The interim SA report for the Options Document was published for consultation from 19<sup>th</sup> October 2009 to 11<sup>th</sup> December 2009. The period for receipt of comments was extended for an additional 5 weeks due to the high level of interest in the consultation.

Core Strategy Consultation Report Issues and Option Stages (May 2011) below sets out the details of the consultations including the comments received for the SA and key issues raised and Council's responses.

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/Submission/05CD5-8ConsultationReportReg301d.pdf>

#### **3.3 Publication Stage Dec 2010**

A draft SA Report was published for consultation alongside the Publication Core Strategy during the period 16th December 2010 to 3rd February 2011. The purpose of that consultation was to provide the statutory environmental bodies and other interested parties with the opportunity to express their opinion on the SA Report. It also enabled the reader to use the information within the SA Report to guide their deliberations and comments on the plan.



The consultation statement below sets out the consultation and community involvement undertaken for consultation on Bath and North East Somerset Council's Draft Core Strategy Publication document.

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/Submission/06CD5-9RegulationReport301e.pdf>

### **3.4 The Proposed Changes to the Submitted Core Strategy 2013**

The SA of the Proposed Changes to the Submitted Core Strategy 2013 was undertaken in March 2013. This report was an update of previous SA reports that have been provided throughout the drafting of the Local Plan process. The SA report produced at this stage focused purely on the Proposed Changes to the Submitted Core Strategy, therefore only the following SA documents were consulted on:

- SA report and Non-Technical Summary (this report);
- Results of a screening exercise on the Proposed Changes to the Submitted Core Strategy that sets out in detail which changes were considered significant and therefore which changes to the plan have been assessed (Annex M);
- SA matrices of the Proposed Changes to Submitted Core Strategy (Annex D); and
- SA matrices of the locational alternative appraisal (Annex L).

The SA report was also consulted on alongside the Proposed Changes to the Submitted Core Strategy 2013 for a 6 week period, 26th March – 8th May 2013. The previous annexes were available on the Councils website:

The consultation summary report for the Proposed Changes to the Submitted Core Strategy can be accessed from the link below.

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/scspc\\_consultation\\_report.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/scspc_consultation_report.pdf)

In November 2013 Amendments to the Proposed Changes to the Core Strategy were published for consultation with an Addendum to the Sustainability Appraisal Report. This dealt with changes to the allocation of urban extension sites to respond to the Inspector's concerns and was available for consultation from the 11th November to the 20th December 2013.

The Consultation Report for the Amendments can be accessed from the link below. [http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/csa\\_consultation\\_report.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/csa_consultation_report.pdf)

## **4. Reasons for choosing the plan as adopted**

The process of preparing the Core Strategy is itself one that involves consideration of issues and options. Consideration of alternatives as required by the SEA Regulations has therefore been an integral part of that process. The reasons for developing and selecting the strategy as chosen at different stages has been outlined in previous SA reports and is not repeated here. However, a summary of the issues and options assessments that have been carried out at each stage of the SA process and where to find out more information, such as their findings, is outlined below

### **4.1 Options Appraisals in 2008**

The Core Strategy Issues and Options Paper (October 2008) was appraised by the SA consultants. Comments and recommendations were fed back to B&NES officers as the paper was developed. The results of this process are recorded in the Core Strategy Spatial Options- Interim Sustainability Appraisal September 2009 Section 4 and Appendix A, which can be found here:

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/SpatialOptions/CSSO-SustainabilityAppraisal.pdf>

### **4.2 Spatial Options Appraisals (2009)**

The Core Strategy Spatial Options Consultation document (October 2009) set out discreet options which were subject to sustainability appraisal in August 2009. These included: district wide spatial options and spatial options for Bath, a new neighbourhood in an urban extension to Bath, Keynsham, New Neighbourhood at South East Bristol, Midsomer Norton and Radstock, and options for Rural areas. The consultation document also outlined core policies.

Detailed policy wording was not included in the Spatial Options document. At this stage the issues dealt with by the policies along with a suggested policy direction were indicated. The conclusions of the SA at the Options stage, along with the consultation responses and additional evidence, were used to inform the preparation of policy wording included in the Publication Core Strategy.

The full results of the Spatial Options appraisals are presented within the Core Strategy Spatial Options Interim Sustainability Appraisal Report Appendix A (September 2009, Revised December 2009 CD4/A6), which can be found here:

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core\\_documents\\_list.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf)

### **4.3 Additional work on Urban Extensions (August 2011)**

Through the appraisal of the Spatial Options Consultation document (October 2009) the SA appraised and compared the merits and disadvantages of two options for urban extensions to the South East of Bristol, at Whitchurch and at Hicks Gate which adjoined the Bristol City Council administrative area and two options for urban extensions to Bath, at Twerton to the west of the city, and on the Odd Down plateau to the south.

The chosen District Spatial Strategy included within the Publication Core Strategy moved away from urban extensions because in order to meet the re-assessed overall strategic housing requirement urban extensions were not needed. The options presented within the Core Strategy Spatial Options consultation document (October 2009) did not include an option with no urban extensions. As such, it was difficult to compare the potential positive and negative effects of the options considered in the Spatial Options document with the spatial strategy presented within the Publication and the Submission Core Strategy.

In order to ensure that the sustainability implications of the District Spatial Strategy (DW1) which did not include urban extensions were fully understood, an additional assessment was undertaken to examine the implication of moving away from the options of urban extensions considered in the Core Strategy Spatial options consultation document (October 2009). The assessment considered and compared (as far as possible) the effects of the options which included urban extensions appraised through SA in 2009 and the effects of the Publication Core Strategy District –wide Spatial Strategy appraised as a part of the whole Publication Core Strategy in 2010.

In light of concerns raised by the Examination Inspector (in ID/1) regarding whether adequate flexibility existed in the Submitted Plan to respond to different circumstances an assessment was undertaken in August 2011 of the relative performance of housing contingency locations, which included the four areas considered previously, however the scale and the area of development were modified. This assessment can be found in full in Annex K. This assessment was undertaken using the SA Framework used to assess the previous options and thus for the purposes of the Regulations, was compatible with previous assessments and informed the development of the submitted plan. The assessment not only considered a relative comparison of the four sites, but also considered the sites relative to the existing plan – that is without release of Green Belt.

#### **4.4 Transport Strategy**

Changes to some aspects of the Council's Transport Strategy for Bath were made within the Submission version of the Core Strategy and these are detailed within Annex J of the SA Report (ENVIRON, 2011). The Measures included were:

- Bath Transport Package – comprising a range of measures including three extended Park & Ride sites; upgrading nine routes to showcase standard including upgrades to bus stop infrastructure and variable message signs on key routes into the city displaying information about car parking availability;
- Improvements to the bus network through the Greater Bristol Bus Network major scheme including key routes from Bristol and Mid Somer Norton;
- Rail improvements, such as the electrification of Great Western Railway mainline by 2016; the new 15 year GWR franchise (including the Greater Bristol Metro Project);

and increasing the capacity of local rail services travelling through Bath Spa rail station, improving attractiveness of rail travel to and from Bath;

- B&NES has been awarded Local Sustainable Transport Fund key component funding for a number of measures and also been invited by the Department for Transport to submit a major bid to the Local Sustainable Transport Fund for £25.5million jointly with the other three West of England authorities;

- Creating a more pedestrian and cyclist-friendly city centre through the introduction of access changes on a number of streets and expansion and enhancement of pedestrian areas;
- Other improvements to walking and cycling infrastructure through the Council's Integrated Transport annual settlement and the implementation of 'Smarter Choices' for transport e.g. through the development of travel plans for new and existing sites and the expansion of car clubs;
- Updating the Council's Parking Strategy for Bath which will broadly maintain central area car parking at existing levels in the short term and continue to prioritise management of that parking for short and medium stay users.

Therefore there has been the deletion of the previously proposed new Park and Ride site to the east of the city. The reasons for this deletion was to allow alternatives to be developed possibly involving rail, to maximise the potential benefits of electrification of the GWR and the awarding of an extended rail franchise to achieve substantial modal shift.

In addition the Council agreed to:

- instruct officers to work on alternatives to Bathampton Meadows park and ride, possibly involving rail, as part of the future Transport Strategy;
- liaise with Wiltshire Council and other authorities about measures to remove some of the through traffic along the London Road and other cross border transport issues;
- implement measures to remove HGVs from London Road - this 10% of traffic creates 40% of the pollution;
- instruct officers to examine how we can obtain substantial "modal shift" from the private car to rail in recognition of potential for rail expansion with the electrification of the GWR and the awarding of an extended rail franchise.

#### **4.5 Appraisals of the Proposed Changes to the Submitted Core Strategy including urban extension locational alternatives**

##### March 2013

Options have continued to be tested as part of the assessment of the proposed changes. This was undertaken as part of the Green Belt Site Allocations Sustainability Appraisal which was published in March 2013 as Annex L to the SA Report.

##### November 2013

Detailed studies such as the Addendum to the Landscape & Visual Impact Assessment and Preliminary Ecological Surveys and Assessment have set out the impact and effects of new development and potential for mitigations helping to gain further understanding of the potential allocation sites and informing the site selection process. The site specific SA (Annex O) helped to avoid the areas which have higher negative effects on sustainability objectives without appropriate mitigation. The results of the assessments of the selected Green Belt sites / site allocations were presented as Annex O to the SA Report and were published in November 2013.

## July 2014

This SA Report includes an assessment of the main modifications received from the Inspector and the additional modifications proposed by the Council. The only significant changes requiring additional assessment within the SA were the removal of BREEAM and Code standards where they had previously appeared within the Core Strategy policies. This affected policies CP2 Sustainable Construction, B3A Land adjoining Odd Down, KE3A Land adjoining East Keynsham, KE4 Land adjoining South West Keynsham and RA5 Land at Whitchurch. The appraisals of these policies have been amended within Annex D and Table 6.1 and this change has meant that these policies in some cases perform less well against the following SA Objectives:

- SA Objective 16: Encourage sustainable construction;
- SA Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure;
- SA Objective 19: Encourage careful and efficient use of natural resources; and
- SA Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle).

The Council had proposed a change to make a fifth strategic housing allocation requiring land to be removed from the Green Belt at Weston, Bath. Following the submission of additional assessments the Inspector has not recommended that this be taken forward as a modification to the submitted plan as the exceptional circumstances necessary to change Green Belt boundaries and to justify major development in an Area of Outstanding Natural Beauty are not met in that location for the scale of development proposed. The removal of the Weston site from the adopted Core Strategy is reflected within the final SA Report and Annex D.

### **4.6 How the SA has informed development of the Core Strategy**

The SA has presented the positive and negative effects of the options previously consulted on in order to inform decision making. In most cases, no one option was identified as a preferred option with regards to the SA. However the SA identified where there were potential significant effects which needed to be mitigated either through avoidance or through detailed policy wording. The selection and rejection of alternative options informed by SA has produced a sound Core Strategy which sets the spatial framework for the district to guide the additional housing and economic development required to meet objectively assessed needs. The chosen strategy and locations for development are also viable and deliverable in accordance with the NPPF. The SA of options and subsequent SA of proposed changes have influenced the development of the Core Strategy as proposed to be adopted in the following specific ways:

- The Core Strategy objectives now include references to health and wellbeing, addressing health inequalities, safety, increasing local food production, provision and access to training, especially in the Somer Valley, reducing the need and desire to travel by car and access to high quality sustainable transport, promoting local character and distinctiveness, the protection and provision of green infrastructure, climate change, energy and CO2 reduction;
- More detail is provided in relation to flood mitigation measures needed in specific settlements e.g. Bath;

- Greater emphasis on how air quality issues will be addressed in Bath have been included in the Bath Strategy chapter;
- Creating safe places has been included in the Environmental Quality Policy (CP6);
- References to the need to consider archaeological impact of CHPs and cumulative impacts of new developments on social infrastructure / community facilities have been added to supporting text;
- Greater emphasis has been given to increasing the availability of local produce and materials in the Core Strategy;
- The addition of cultural assets to the policy covering historic environment (policy CP6);
- Enhancement as well as protection/safeguarding of nature conservation assets has been added to the policy covering nature conservation (CP6) and also taking account of climate change through the enhancement of wildlife corridors and green infrastructure;
- Issues of sustainable construction are now covered in a specific sustainable construction policy;
- A specific decentralised energy policy is now included (policy CP4);
- Consideration of pollution and utilities provision is included in policy CP11 Gypsies, Travellers and Travelling Showpeople Policy;
- Sites for gypsies, travellers and travelling showpeople are suitably located to allow access by sustainable modes of transport (CP11);
- Centres and retailing (policy CP12) now supports the provision of markets and community facilities within settlement centres;
- Greater emphasis is given to sustainable transport in the Rural Areas Strategy chapter;
- Inclusion of the reuse of the Cadbury's buildings in policy KE2;
- The provision of training and improving skills is dealt with in the place-based policies, where skills levels have been identified in certain places (i.e. Midsomer Norton and Radstock policy SV1);
- The Somer Valley vision and spatial strategy refers to the need to improve skills in the Somer Valley area in order to deliver growth in the local economy in that area;
- The Sustainable Construction Core Policy CP2 encourages the reuse and recycling of demolition materials;
- Affordable Housing (policy CP9) is now required to be integrated within a development and should not be distinguishable from market housing; and
- Landscape and visual assessment, ecological and archaeological studies have been undertaken to inform the assessment and allocation of greenfield sites in the Core Strategy (see Annex O). Further work will be needed to inform the masterplanning of these sites at MoD Ensleigh, Odd Down, Keynsham and Whitchurch.

## 4 Monitoring

The SEA Regulations require Local Authorities to ‘monitor the significant environmental effects of the implementation of each plan or programme, with the purpose of identifying unforeseen adverse effects<sup>2</sup> at an early stage and being able to undertake appropriate remedial action’. Monitoring is required for all significant effects, both positive and negative, as well as uncertain effects identified in the SA. The SEA Regulations allow monitoring to be integrated with existing monitoring programmes to reduce duplication of effort.

The table below sets out the proposed significant effects monitoring programme. It is important that the indicators suggested are compatible as far as possible with those used by B&NES. This table and Table I.1 in Annex I ‘Contextual Indicators Monitoring Programme’ identify the proposed source of indicators.

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/core\\_strategy\\_sa\\_report\\_annex\\_i.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/core_strategy_sa_report_annex_i.pdf)

<b>Proposed Monitoring Programme – Significant Effects Indicators</b>				
<b>Potential issue</b>	<b>Proposed indicators</b>	<b>Published targets</b>	<b>Source of data</b>	<b>Frequency of reporting</b>
Potential negative effects of the housing allocation sites with regards to heritage and culture, pollution and local distinctiveness	Potential effects (as appropriate – see Table 6.1 in the SA Report and Annex D) in relation to: <ul style="list-style-type: none"> <li>• SA Objective 12 Protect and enhance local distinctiveness;</li> <li>• SA Objective 13 Protect and enhance the district’s historic, environmental and cultural assets; and</li> <li>• SA Objective 15 Reduce land, water, air, light, noise pollution.</li> </ul>	See the Placemaking Principles within the site allocation policies. See also the Placemaking Plan DPD.	Environmental Statements (ES) submitted with planning applications on these sites. Planning obligations including any management plans deemed necessary.	Reported in the ES and any management plan reporting required through planning obligations.
Potential negative effects of flood defence schemes in Bath	Potential effects in relation to SA Objective 14: Encourage and protect habitats and biodiversity. (taking account of climate	None	Environmental Statements (ES) submitted with Flood Defence Consent application.	Reported in the ES.

<sup>2</sup> ‘unforeseen adverse effects’ refer to shortcomings in the predictions in the SA Report (e.g. regarding the predicted intensity of an environmental effect) or unforeseen effects resulting from changes in circumstances, which have led to certain assumptions in the SA being partly or wholly invalidated.

	change)			
Congestion	Average AM peak journey time per mile	Targets included in West of England Local Transport Plan 3.	Local Transport Plan 3 monitoring	Annual
Air quality	Annual Mean concentrations of all regulated air pollutants (i.e. benzene, 1.3 butadiene, carbon monoxide, lead, nitrogen dioxide, particles (pm <sub>10</sub> ), sulphur dioxide)	Member States are required to reduce exposure to PM2.5 in urban areas by an average of 20% by 2020 based on 2010 levels. It obliges them to bring exposure levels below 20 micrograms/m <sup>3</sup> by 2015 in these areas. Throughout their territory Member States will need to respect the PM2.5 limit value set at 25.	B&NES	Bi-annual